

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

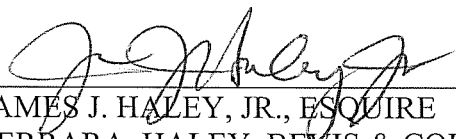
<b>UNITED STATE OF AMERICA,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>v.</b>	)	<b>Criminal Action No. 06-23-1-KAJ</b>
	)	
<b>NICOLE PFUND,</b>	)	
	)	
<b>Defendant.</b>	)	

**NOTICE OF MOTION**

TO: Shannon T. Hanson, Esquire  
United States Dept. of Justice  
District of Delaware  
1007 Orange Street, Suite 700  
P. O. Box 2046  
Wilmington, DE 19899

Walter P. Matthews, III  
U.S. Probation & Pretrial Services  
District of Delaware  
J. Caleb Boggs Federal Bldg.  
Lockbox #39  
844 King Street  
Wilmington, DE 19801

PLEASE TAKE NOTICE that the undersigned will present the attached Motion to Continue Sentencing before The Honorable Kent A. Jordan at the convenience of the Court.

  
\_\_\_\_\_  
JAMES J. HALEY, JR., ESQUIRE  
FERRARA, HALEY, BEVIS & COLLINS  
1716 Wawaset Street  
P. O. Box 188  
Wilmington, DE 19899  
(302) 656-7247  
Attorney for Defendant

Dated: September 27, 2006

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

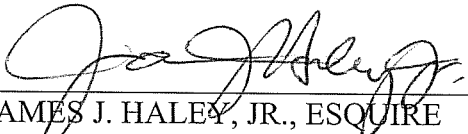
<b>UNITED STATE OF AMERICA,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
v.	)	<b>Criminal Action No. 06-23-1-KAJ</b>
	)	
<b>NICOLE PFUND,</b>	)	
	)	
<b>Defendant.</b>	)	

**MOTION TO CONTINUE SENTENCING**

NOW COMES Defendant Nicole Pfund and hereby moves the Court to continue the October 11, 2006 sentencing for three to four weeks. In support of her Motion, Defendant states as follows:

1. Sentencing is scheduled for October 11, 2006 at 4:30 p.m.
2. Defendant and counsel have received a draft of the pre-sentence report. Said report was surprising to counsel and defendant in that it calculated a criminal history significantly above what defendant and counsel had anticipated. Defendant and counsel have spoken to the pre-sentence investigation officer, who has confirmed that defendant's criminal history presents a complicated picture.
3. Defense counsel and defendant require more time to digest the information in the pre-sentence report and to respond to same.

WHEREFORE the Defendant respectfully requests the Court to enter an Order continuing the sentencing hearing by three to four weeks.

  
\_\_\_\_\_  
JAMES J. HALEY, JR., ESQUIRE  
FERRARA, HALEY, BEVIS & COLLINS  
1716 Wawaset Street  
P. O. Box 188  
Wilmington, DE 19899  
(302) 656-7247  
Attorney for Defendant

Dated: September 27, 2006

IT IS SO ORDERED this \_\_\_\_\_ day  
of \_\_\_\_\_, 2006.

\_\_\_\_\_  
J.

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**


<b>UNITED STATE OF AMERICA,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>v.</b>	)	<b>Criminal Action No. 06-23-1-KAJ</b>
	)	
<b>NICOLE PFUND,</b>	)	
	)	
<b>Defendant.</b>	)	

**CERTIFICATE OF SERVICE**

I, JAMES J. HALEY, JR., ESQUIRE, hereby certify that two (2) copies of the Defendant's Motion to Continue Sentencing were served by mail on September 27, 2006 upon:

Shannon T. Hanson, Esquire  
United States Dept. of Justice  
District of Delaware  
1007 Orange Street, Suite 700  
P. O. Box 2046  
Wilmington, DE 19899

Walter P. Matthews, III  
U.S. Probation & Pretrial Services  
District of Delaware  
J. Caleb Boggs Federal Bldg.  
Lockbox #39  
844 King Street  
Wilmington, DE 19801

  
\_\_\_\_\_  
JAMES J. HALEY, JR., ESQUIRE  
FERRARA, HALEY, BEVIS & COLLINS  
1716 Wawaset Street  
P. O. Box 188  
Wilmington, DE 19899  
(302) 656-7247  
Attorney for Defendant

Dated: September 27, 2006